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the proximate cause of his death, where he is subsequently run over and killed by an engine belonging to another company which the first company knew had a right to use the track and was likely to use it at any time.

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**CONTRACTS—VALIDITY—PUBLIC POLICY.**—A contract by the publisher of a newspaper to use it in influencing the choice of delegates and the action of a convention in favor of a certain candidate for public office is held, in *Livingston v. Page* (Vt.), 59 L. R. A. 336, to be void as contrary to public policy.

Perhaps the deliverance of the court would have been more emphatic had it known of the "Barksdale Bill" recently enacted by the General Assembly of Virginia.

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**INSURANCE—VERBAL ASSIGNMENTS OF POLICY.**—A verbal assignment of a policy of life insurance by the insured, accompanied by words indicating an intention to give and by a delivery of, the policy, is held, in *Steele v. Gatlin* (Ga.), 59 L. R. A. 129, not to constitute a complete gift; and in such case it is held that a court of equity will not interfere at the instance of the alleged donee to complete the gift, when she has not acted to her injury or incurred expense on the faith of it.

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**CONSTITUTIONAL LAW—RESIDENT AGENTS FOR FOREIGN INSURANCE COMPANIES.**—Confining the right to act as agent for foreign insurance companies to residents of the State is held, in *Cook v. Howland* (Vt.), 59 L. R. A. 338, not to be an unconstitutional impairment of the privileges and immunities of citizens of other States.

We question the correctness of this ruling. If it is sound it comes very near the dead line laid down by recent Federal decisions.

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**ACCIDENT INSURANCE—DOUBLE INDEMNITY.**—A railroad paymaster traveling upon business of the company from station to station, and stopping between stations for the purpose of paying off employees wherever they may be, is held in *Travelers' Ins. Co. v. Austin* (Ga.), 59 L. R. A. 107, not to be, while so doing, a "passenger" within the meaning of a policy of accident insurance granting double indemnity to the insured if injured while riding as a passenger on a passenger car using steam as a motive power.

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**JUDGMENTS—DIVORCE—CONFLICT OF LAWS.**—A judgment of divorce rendered in a State in which the wife has acquired a separate domicile, and valid there, is declared, in *Succession of Benton* (Lu.), 59 L. R. A. 135, to be valid in other jurisdiction.

With this case is an extensive note reviewing the authorities on conflict of laws on the subject of divorce, and in view of recent utterances of the Federal Supreme Court, this note should be carefully conned.

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**MUNICIPAL CORPORATIONS—CHARTER AUTHORITY FOR ERECTION OF BUILDINGS.**—Charter authority to make regulations to guard against construction of buildings so as to be unsafe or inflammable or dangerous to health, life, or